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By ECF

The Honorable Jesse M. Furman
United States District Court
Southern District of New York
40 Centre Street
New York, NY 10007

The Honorable Martin Glenn
United States Bankruptcy Court
Southern District of New York
One Bowling Green, Courtroom 523
New York, New York 10004

Re: Joint Hearing – *In re Motors Liquidation Company, f/k/a General Motors Corporation, et al.*, Case No. 09-50026 (MG) (the “Bankruptcy Action”);
In re General Motors LLC Ignition Switch Litig., 14-MD-2543 (JMF)
(the “MDL Proceedings”)

Dear Judge Furman and Judge Glenn:

We represent the Motors Liquidation Company Avoidance Action Trust (the “AAT”) in connection with proceedings in the Bankruptcy Action before Judge Glenn. The AAT is not and has never been a party to the MDL Proceedings. However, the AAT intends to file an objection (the “AAT Objection”) in the Bankruptcy Court to the motion of the Motors Liquidation Company GUC Trust seeking entry of an order approving certain actions to be undertaken by the GUC Trust Administrator in connection with the settlement agreement among a putative class of economic loss plaintiffs, the GUC Trust and New GM (Bankr. Dkt. No. 14691). The AAT would like to be heard at the joint hearing to be held on April 23, 2020 with respect to the AAT Objection.

Accordingly, pursuant to Order No. 168 (MDL Dkt. No. 7845), we write to respectfully request that Eric B. Fisher from Binder & Schwartz LLP be granted speaking privileges on behalf of the AAT.

We thank Your Honors for your attention to this letter.

Respectfully,

s/ Eric B. Fisher
Eric B. Fisher

cc: All counsel of record (via ECF)